

# Exhibit 15

# **NIGERIA 2021 HUMAN RIGHTS REPORT**

## **EXECUTIVE SUMMARY**

Nigeria is a federal republic composed of 36 states and the Federal Capital Territory. In 2019 citizens re-elected President Muhammadu Buhari of the All Progressives Congress party to a second four-year term. Most independent observers agreed the election outcome was credible despite logistical challenges, localized violence, and some irregularities.

The Nigeria Police Force, which reports to the Ministry of Police and is overseen by the Police Service Commission, is the primary civilian law enforcement agency and enjoys broad jurisdiction throughout the country. The Ministry of Interior also conducts security and law enforcement activities. The Department of State Services, which reports to the national security advisor in the Office of the President, is responsible for counterintelligence, internal security, counterterrorism, and surveillance as well as protection of senior government officials. The Nigerian Armed Forces, which report to the minister of defense, also share domestic security responsibilities as stipulated in the constitution in the case of insufficient capacity and staffing of domestic law enforcement agencies or as ordered by the president. Many states, in response to increased violence, insecurity, and criminality that exceeded the response capacity of government security forces, created local “security” vigilante forces. These local forces reported to the state governor. Civilian authorities did not always maintain effective control over the security services. There were credible reports that members of the security forces committed numerous abuses.

The insurgency in the North East by the militant terrorist groups Boko Haram and the Islamic State in West Africa continued. The terrorist groups conducted numerous attacks on government and civilian targets, resulting in thousands of deaths and injuries, numerous human rights abuses, widespread destruction, the internal displacement of more than three million persons, and the external displacement of more than an estimated 327,000 Nigerian refugees to neighboring countries as of the year’s end.

Significant human rights abuses included credible reports of: unlawful and arbitrary killings by both government and nonstate actors; forced disappearances by the government, terrorists, and criminal groups; torture and cases of cruel, inhuman, or degrading treatment or punishment by the government and terrorist groups; harsh and life-threatening prison conditions; arbitrary arrest or detention; political prisoners; serious problems with the independence of the judiciary; arbitrary or unlawful interference with privacy; serious abuses in a conflict, including killings, abductions, and torture of civilians; serious restrictions on free expression and media, including violence or threats against journalists and the existence of criminal libel laws; serious restrictions on internet freedom; substantial interference with the freedom of peaceful assembly and freedom of association; serious government corruption; lack of investigation and accountability for gender-based violence, including but not limited to domestic and intimate partner violence, sexual violence, child, early and forced marriage, female genital mutilation/cutting, and other harmful practices; crimes of violence targeting members of national/racial/ethnic minority groups; the existence or use of laws criminalizing consensual same-sex sexual conduct between adults; and the existence of the worst forms of child labor.

The government took steps to investigate, punish, and prosecute alleged abuses by military and police forces, including the now disbanded police Special Anti-Robbery Squad, but impunity for such abuses and corruption remained a problem.

Boko Haram and the Islamic State in West Africa continued attacks on civilians, military, police, humanitarian, and religious targets; recruited and forcefully conscripted child soldiers; and carried out scores of attacks on population centers in the North East and in Cameroon, Chad, and Niger. Abductions by Boko Haram and the Islamic State in West Africa continued. Both groups subjected many women and girls to sexual and gender-based violence, including forced marriages, sexual slavery, and rape. The government investigated attacks by Boko Haram and Islamic State in West Africa and took steps to counter the growth of the insurgency. The Eastern Security Network, the armed wing of the Indigenous People of Biafra separatist movement, staged multiple attacks on government buildings, including police stations, in the South East and reportedly killed dozens of security force officers. Criminal gangs killed civilians and conducted mass

kidnappings that particularly targeted school-age children in the North West.

## **Section 1. Respect for the Integrity of the Person**

### **a. Arbitrary Deprivation of Life and other Unlawful or Politically Motivated Killings**

There were reports that the government or its agents committed arbitrary, unlawful, or extrajudicial killings. At times authorities investigated and held accountable police, military, or other security force personnel responsible for the use of excessive or deadly force or for the deaths of persons in custody. Instances of unlawful or extrajudicial killings in the army, air force, and navy are initially investigated by commanding officers who decide whether an accusation merits low-level discipline or the initiation of court-martial proceedings, which are subject to appeal before military councils and the civilian Court of Appeals. The army used a human rights desk in Maiduguri to investigate allegations of abuse during military operations in the North East. The government regularly utilized disciplinary boards, judicial panels of inquiry, or internal complaint mechanisms to investigate abuses by security forces. When warranted, these bodies made recommendations of proposed disciplinary measures to the state or federal government. State and federal panels of inquiry investigating suspicious deaths did not always make their findings public.

The national police, army, and other security services sometimes used force to disperse protesters and apprehend criminals and suspects. Police forces engaging in crowd-control operations generally attempted to disperse crowds using nonlethal tactics, such as firing tear gas, before escalating their use of force.

On August 13, the Osun State Police Command announced the dismissal of Sergeant Adamu Garba, who shot and killed a motorcycle rider on July 27. Police reportedly dismissed the officer while judicial authorities prosecuted him, although no further information on the judicial process to hold the officer accountable was available.

The Lagos State government established a judicial panel in October 2020 to investigate alleged abuses committed by the disbanded Special Anti-Robbery

**Discrimination:** Although the constitution provides the same legal status and rights for women as for men, and there were no known legal restrictions on women's working hours or jobs deemed too dangerous for women, there were limitations on women's employment in certain industries such as construction, energy, and agriculture. Women experienced considerable economic discrimination. The law does not mandate equal remuneration for work of equal value, nor does it mandate nondiscrimination based on gender in hiring.

Women generally remained marginalized. No laws prohibit women from owning land, but customary land tenure systems allowed only men to own land, with women gaining access to land only via marriage or family. Many customary practices also did not recognize a woman's right to inherit property, and many widows became destitute when their in-laws took virtually all the deceased husband's property. In March the Akwa Ibom High Court ruled that the Etinan council area must allow women to inherit property.

In the 12 northern states that adopted sharia, religious and social norms affected women to varying degrees. For example, in Zamfara State local governments enforced laws requiring the separation of Muslim men and women in transportation and health care.

Women could arrange but not post bail at most police detention facilities.

## **Systemic Racial or Ethnic Violence and Discrimination**

The country's ethnically diverse population consisted of more than 250 groups speaking 395 different languages. Many were concentrated geographically. Three major groups – Hausa, Igbo, and Yoruba – together constituted approximately one-half the population. Members of all ethnic groups reportedly practiced ethnic discrimination, particularly in private sector hiring patterns and the segregation of urban neighborhoods. A long history of tension existed among some ethnic groups. The government's efforts to address tensions among ethnic groups typically involved heavily concentrated security actions, incorporating police, military, and other security services, often in the form of a joint task force.

The law prohibits ethnic discrimination by the government, but most ethnic groups claimed marginalization in terms of government revenue allocation, political

representation, or both.

The constitution requires the government to have a “federal character,” meaning that cabinet and other high-level positions must be distributed to persons representing each of the 36 states or each of the six geopolitical regions. President Buhari’s cabinet appointments conformed to this policy. Traditional relationships were used to pressure government officials to favor particular ethnic groups in the distribution of important positions and other patronage.

All citizens have the right to live in any part of the country, but state and local governments frequently discriminated against ethnic groups not indigenous to their areas, occasionally compelling individuals to return to a region where their ethnic group originated but where they no longer had ties. State and local governments sometimes compelled nonindigenous persons to move by threats, discrimination in hiring and employment, or destruction of their homes. Those who chose to stay sometimes experienced further discrimination, including denial of scholarships and exclusion from employment in the civil service, police, and military. For example, in Plateau State the predominantly Muslim and nonindigenous Hausa and Fulani often faced discrimination from the local government in land ownership, jobs, access to education, scholarships, and government representation.

Land disputes, competition concerning dwindling resources, ethnic differences, and settler-indigene tensions contributed to clashes between herdsmen and farmers throughout the North Central geopolitical zone. Ethnic and religious affiliation also contributed to and exacerbated some local conflicts. Nevertheless, many international organizations, including the International Crisis Group, assessed these divisions were incidental to the farmer-herder conflict. Conflicts concerning land rights continued among members of the Tiv, Kwalla, Jukun, Fulani, and Azara ethnic groups living near the convergence of Nasarawa, Benue, and Taraba states.

The government engaged in efforts to quell intercommunal conflict. For example, the Kaduna Peace Commission sought out national religious leaders to convene a meeting within the state that included prominent local and national traditional and religious leaders to condemn the chronic violence there. Taraba State enlisted the help of the Taraba Interreligious Council to draw up plans to initiate a state government agency to promote reconciliation and peacebuilding between farmers